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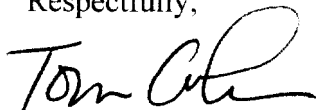
May 13, 1996

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Dear Mr. Caton:

Today Lucent Technologies filed the attached paper with Karen Brinkman, Associate Bureau Chief. Please include as an ex parte filing in WT Docket No. 96-6.

Respectfully,



Tom Cohen  
Attorney for Lucent Technologies  
Attachment

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20541

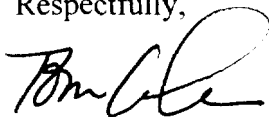
Ms. Karen Brinkman  
Associate Bureau Chief  
Wireless Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 5002  
Washington, D.C. 20554

Dear Ms. Brinkman;

The attached paper presents Lucent Technologies' concerns regarding WT Docket No. 96-6.

We will file this with the Secretary of the FCC as an ex parte in this proceeding. Please call with any questions.

Respectfully,



Tom Cohen  
Attorney for Lucent Technologies  
Attachment

## **The Lack of Clarity on Service Flexibility for CMRS is Damaging US Competitiveness.**

Lucent Technologies Inc. (formerly AT&T Technologies) is compelled to request the FCC to grant CMRS providers the full service flexibility they need as proposed under WT Docket No. 96-6 as soon as possible.

Because of the lack of regulatory clarity on the very fundamental question of whether or not fixed Wireless Local Loop (WLL) services will be allowed under the rules as a full fledged service in the CMRS bands, the US R&D community is being held back from aggressively pursuing the technologies necessary to support this service with vigor that it deserves. The consequences of this lack of regulatory clarity are rapidly starting to manifest themselves on a global basis in the following manner:

Since there is no clear-cut allocation for WLL in the US, there are consequently no standards activities in the US that are addressing the specific technical issues of Wireless Local Loop. Europe in contrast, has at least two standards efforts well under way on this issue and has allocated spectrum specifically for this propose. (We believe that once there is a more detailed focus on this issue in the US, there will be a need to further optimize the rules to accommodate fixed WLL applications for the PCS band.)

When developing countries look to the US manufacturers for guidance regarding spectrum allocations specifically for fixed WLL, we have little concrete information to offer them because the US has yet to resolve the issue after years of debate. Consequently, when these countries do allocate spectrum for WLL, they naturally align their spectrum allocations with that of Europe since Europe's direction is clearly defined and the technologies are being developed specifically for that purpose

In the case of one country we are working closely with, which has adopted the US direction on PCS in the 1850 to 1990 MHz band, their regulators are now considering postponing the PCS allocation in favor of allocations for WLL because they feel that the PCS allocation does not support the WLL technologies they need to bring basic telecommunications to their developing country. In just the past few days, the regulators of the country in question, have proposed a number of allocations for WLL all of which align with European allocations and favor European technologies. Our lack of regulatory clarity in on Wireless Local Loop is now clearly damaging the US's global R&D position in wireless communications and it is within the Commission's power to begin the process of correcting this competitive imbalance.

Therefore, Lucent Technologies respectfully requests that the Commission take immediate action to issue an order on service flexibility and grant our customers the regulatory flexibility they need in order to provide Wireless Local Loop in the CMRS bands. Any further delay on this issue will continue to profoundly impact not only our internal domestic needs for WLL, but will also continue hold back US R&D investment and retard our competitive position in this important wireless technology of the future.

Finally, once the Commission completes action granting service flexibility, Lucent urges it to turn its attention to the less immediate, but more complex and time consuming, technical and jurisdictional issues.